

- (1) the Court, Court personnel, court reporters and depositions and, if applicable, the Jury;
- (2) the Plaintiff and his attorney of record, other attorneys acting “of counsel” for the Plaintiff in this action provided said attorneys are shown a copy of this Stipulation and agree to be bound by same, and persons employed in said attorneys’ offices;

- (3) Defendants, Defendants' attorneys of record, other attorneys acting "of counsel" for Defendant in this action provided said attorneys are shown a copy of this Stipulation and agree to be bound by same, and persons employed in said attorneys' offices;
- (4) persons retained in this action to assist in the prosecution or defense of this action, including technical and professional experts and persons employed and affiliated with such experts provided that said individuals are shown a copy this Stipulation, and agree to be bound by same; and
- (5) witnesses during the course of depositions, trial testimony or pre-deposition or pre-trial preparation.

The parties further agree that documents marked confidential shall not be disclosed to any other party and/or his or her attorney of record in this Action ("Other Party"), unless that Other Party has executed an appropriate Confidentiality Stipulation.

In the event that either party disagrees with any designation of confidential information, counsel for each party shall notify opposing counsel of their objection in writing. The parties shall confer and attempt to resolve the matter informally. If they are unable to do so, an application may be made to the Court for a determination whether particular documents or other information should be treated as confidential information or whether the disclosure of the information shall be permitted. The information in question shall be treated as confidential information, subject to the terms of this Confidentiality Agreement, until the dispute is resolved (either by agreement of counsel for the parties or by an Order of the Court).

Dated: June 29, 2023  
New York, New York

Dated: June 29, 2023  
New York, New York

**STIPULATED AND AGREED TO:**

/s/ Siobhan Klassen  
Siobhan Klassen  
Goddard Law PLLC  
39 Broadway, Suite 1540  
New York, New York 10006  
Tel. (646) 964-1178  
Siobhan@goddardlawnyc.com

*Attorneys for the Plaintiff*

/s/ Mary Ellen Donnelly  
Mary Ellen Donnelly  
BOND, SCHOENECK & KING, PLLC  
600 Third Avenue, 22nd Floor  
New York, New York 10016  
Tel. (646) 253-2300  
Mdonnelly@bsk.com

*Attorneys for Defendants*

**SO ORDERED:**

Dated: June 30, 2023  
New York, New York

  
\_\_\_\_\_  
ANALISA TORRES  
United States District Judge